



**Board of County Commissioners**

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November 1, 2023

Greg Larson, District Manager  
BLM Upper Colorado River District  
2815 H Road  
Grand Junction, CO 81506

Re: Comments on Draft SEIS for the Colorado River Valley Field Office and Grand Junction Field Office Supplemental EIS (DOI-BLM-CO-G020-2022-0001-RMP-EIS)

Dear Mr. Larson,

Thank you for your work to revise portions of the Resource Management Plan for public lands in Eagle County through the Colorado River Valley Field Office and Grand Junction Field Office Supplemental EIS (SEIS). Eagle County is a cooperator in the planning process and submitted comments during the scoping period, as well as supplementary comments after the scoping period closed. This letter includes my feedback as Chair of the Eagle County Board of County Commissioners on the Draft SEIS.

The new alternatives E & F represent a step in the right direction. Both alternatives will scale down climate pollution while scaling up conservation - a win-win for our public lands, wildlife habitat, western communities and Colorado's future. However, Alternative F does significantly more to protect our local public lands from the unprecedented stresses of climate change, habitat loss, drought, and increased visitation and recreational pressures. This is why I strongly urge the BLM to select alternative F, or at the very minimum, include critical Areas of Critical Environmental Concern and other protections from alternative F (detailed below) into the alternative ultimately selected by the agency.

Conservation of our public lands is increasingly important to Eagle County residents and visitors. Protecting wildlands benefits wildlife, provides for more sustainable recreation and mitigates the impacts of climate change. Because federal public lands comprise so much of Eagle County's land area, we rely on federal land manager partners to work with us to maintain the integrity of these wildland habitats and watersheds. I look to the BLM to utilize legislative and administrative designations and other tools at your disposal.

Congressionally designated areas such as the Holy Cross and Eagle's Nest Wilderness areas are popular and cherished places, and the County also benefits from the protections provided through administrative management tools such as Inventoried Roadless Areas on our national forests and BLM's wilderness study areas (WSAs), Areas of Critical Environmental Concern (ACECs), Special Recreation Management Areas (SRMAs) and managed Lands with Wilderness Characteristics (LWC). These administrative tools provide durable protections and focused management to protect critical resources.



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I strongly support BLM's proposal to use administrative protections to manage wildlands in Eagle County under Alternative F. For example, I would like to see the Castle Peak Addition managed as a WSA under Section 202 of the Federal Land Policy and Management Act. 43 U.S.C. § 1712.<sup>1</sup> This would provide long term and meaningful protection for the unique wilderness characteristics that remain in Castle Peak. I also support continued WSA management for Bull Gulch and Hack Lake, and continued management to prioritize protection of wilderness characteristics for the Flat Tops Addition and Pisgah Mountain.

Decisions on the designation and management of WSAs and LWC's should be based on the latest and most accurate inventory of lands with wilderness characteristics. The existing LWC inventory that informed the 2016 Resource Management Plan was flawed and relied on outdated inventory guidance. In particular, the proposed expansion of Castle Peak WSA should designate all adjoining LWC consistent with updated inventory findings.

I further support BLM's proposal under Alternative F to protect several ACECs in Eagle County, including Blue Hill<sup>2</sup>, Bull Gulch<sup>3</sup>, Deep Creek<sup>4</sup>, Abrams Creek<sup>5</sup>, Colorado River Seeps<sup>6</sup>, Dotsero Crater<sup>7</sup>, East Eagle Greater Sage-grouse

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<sup>1</sup> See Draft SEIS at 3-122.

<sup>2</sup> Located northwest of Burns and west of McCoy. Designated as a sensitive area for cultural and Native American resources with the potential to contribute to understanding of history and prehistory. Also classified as a critical watershed due to severely erosive soils. Erosion could destroy and degrade cultural and water resources in the area. See U.S. Dept. of Interior, Bureau of Land Management, Glenwood & Kremmling Field Offices, *Glenwood Springs and Kremmling Field Offices RMP Evaluation of Proposed Areas of Critical Environmental Concern* (Nov. 2007), at 11. Available for download at [https://eplanning.blm.gov/public\\_projects/lup/68506/110860/135752/21\\_Appendix\\_E\\_ACEC\\_Report.pdf](https://eplanning.blm.gov/public_projects/lup/68506/110860/135752/21_Appendix_E_ACEC_Report.pdf).

<sup>3</sup> See *id.*, at 11-12 (designated for high scenic value and to maintain the natural appearing landscape adjacent to the Colorado River. The area is characterized by diverse topography, unique geologic forms, and sharp contrasting colors. The area also retains habitat for sensitive plant species, including Harrington's Penstemon).

<sup>4</sup> *Id.*, at 12 (designated to protect outstanding landforms within the canyon, vegetation and water features which give it high scenic value. The canyon is dramatic and unique. Several geologic faults and unusual erosional formations are found within the canyon, as well as a high concentration of cave and karst resources. The landscape maintains a high degree of naturalness. Meets the importance criteria for more than locally significant qualities and qualities that make the area fragile, sensitive, rare, irreplaceable, unique, and vulnerable to adverse change).

<sup>5</sup> *Id.*, at 21-22 (nominated for rare and sensitive wildlife resources. Abrams Creek contains a genetically pure population of native, wild, naturally reproducing Colorado River cutthroat trout that have been identified as a Core Conservation Population. The watershed supports vital ecosystem processes and maintains crucial habitats important for the long-term survival of this fish species. Core Conservation Populations are important in the overall conservation of the species and are given the highest priority for protection. Given the genetic purity of these fish, the population is unique and irreplaceable).

<sup>6</sup> *Id.*, at 25 (nominated to protect two significant plant communities: *Betula occidentalis*/Mesic grass and *Artemisia tridentata*/*Leymus cinereus*. These plant communities are in exemplary condition. They are rare within the state and relatively rare globally. The Colorado Natural Heritage Program (CNHP) indicated that "This may be one of the most pristine low elevation riparian areas in Eagle County").

<sup>7</sup> *Id.*, at 15-16 (Dotsero Crater represents the youngest known volcanic event in Colorado estimated to be from approximately 4,150 to 4,700 years old. The distinct crater is approximately 800 feet deep and 1/3 mile across with an associated lava flow that extends almost one mile to the south crossing I-70).



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habitat<sup>8</sup>, Hardscrabble-Mayer Gulch<sup>9</sup>, and the McCoy Fan Delta<sup>10</sup>. These areas all retain the relevance and importance criteria necessary to qualify as ACECs, and the unique and sensitive values in these areas deserve special management attention to protect and prevent irreparable damage. If Alternative F is not chosen, at a minimum, I urge the BLM to incorporate protection of these areas into whichever alternative is selected.

Additionally, I support the oil and gas leasing closures proposed in Alternative F. As the Draft SEIS confirms, there is no federal oil and gas production within Eagle County, nor any reasonably foreseeable potential for development.<sup>11</sup> Closure of lands in Eagle County makes good sense. It will allow BLM to focus its limited resources on maintaining the values that make public lands in Eagle County such an important community resource, and it will eliminate any threat of speculative leasing that wastes agency resources without any real public benefit.

The broad closures considered in Alternative F also better align with science based climate targets. Eagle County is working to reduce climate emissions by 50% by 2030.<sup>12</sup> Our community is already experiencing the negative consequences of climate change. From impacts to our recreation-based economy and our water supply, to local wildlife populations and threats from wildfire, we are on the front lines. As a nation, the time for us to act to avoid the most severe impacts from climate change is now. Since “[f]ossil fuel production on public lands accounts for nearly a quarter of all U.S. greenhouse gas emissions,”<sup>13</sup> the BLM should at least consider closing the entire planning area to new leasing.

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<sup>8</sup> *Id.*, at 31 (nominated to protect Greater sage grouse habitat and a small population of Greater sage grouse that still rely on lands in northern Eagle County. This habitat deserves heightened protection and this population of birds may require special management to ensure survival).

<sup>9</sup> *Id.*, at 20-21 (nominated to protect one of the highest known concentrations of Harrington’s penstemon).

<sup>10</sup> *Id.*, at 16 (the McCoy Fan Delta consists of fluvial and marine deposits record depositional events that occurred along the western margin of the Ancestral Front Range. Marine deposits in the area have yielded abundant fossils that include invertebrates, vertebrates, and plant species. The McCoy fan delta is among the best exposed deltaic deposits in the Rocky Mountains and allows for study and observation of paleontological resources and the sedimentary processes that occurred in the geologic past).

<sup>11</sup> See Draft SEIS, Table 3.9-11, at 3-160.

<sup>12</sup> See Eagle County “Climate Action” webpage (“Resiliency’s Climate Action team works to implement the Eagle County Environmental Policy and Climate Action Plan in county operations and within the larger community. Our shared community goal is to reduce greenhouse gas emissions 50% percent by 2030.”), available at [https://www.eaglecounty.us/departments\\_services/resiliency/climate\\_action/index.php#collapse4212b0](https://www.eaglecounty.us/departments_services/resiliency/climate_action/index.php#collapse4212b0).

<sup>13</sup> U.S. Dept. of Interior, Fact Sheet: President Biden to Take Action to Uphold Commitment to Restore Balance on Public Lands and Waters, Invest in Clean Energy Future (Jan. 27, 2021), available at <https://www.doi.gov/pressreleases/fact-sheet-president-biden-take-action-uphold-commitment-restore-balance-public-lands#:~:text=Fossil%20fuel%20extraction%20on%20public.threatens%20cultural%20and%20sacred%20sites>.



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I commend the BLM as it seeks to increase conservation emphasis and balance management in furtherance of its important “multiple use and sustained yield” mission. I urge the BLM to capitalize on the opportunity presented in this SEIS process to ensure meaningful protections for the public lands that are such an important asset to local communities, and to ensure that the updated Resource Management Plans help us cope with the climate crises rather than exacerbating it. I am grateful for Eagle County’s partnership with the BLM and appreciate your consideration of my comments on the draft SEIS.

Sincerely,

Kathy Chandler-Henry

Chair, Eagle County Board of Commissioners